IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 16-2738 (MAS) (RLS) JUDGE MICHAEL A. SHIPP MAG. JUDGE RUKHSANAH L. SINGH
THIS DOCUMENT RELATES TO: MARIA DOTSON,	Civil Action No. 3:20-cv-10755
Plaintiff(s),	
V.	RESPONSE TO APRIL 16, 2025 ORDER TO SHOW CAUSE (DKT.
JOHNSON & JOHNSON, et al.	33664)
Defendants.	

John Foley of Simmons Hanly Conroy, LLP, counsel of record for Plaintiff Maria Dotson, submits the following Response to the Court's April 16, 2025 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33664).

On August 19, 2020, a Short Form Complaint was directly filed on behalf of Plaintiff Maria Dotson in MDL No. 2738. Pursuant to the September 1, 2023 Amended Plaintiffs Profile Form ("PPF") Order, a Plaintiff Profile Form, core records, and signed medical records authorization were required to be served upon Defendants via MDL Centrality by April 15, 2024. Unfortunately, Plaintiff Maria Dotson died during the pendency of the second bankruptcy, and a legal heir had to be identified to act in her stead. Pursuant to the letter written by Susan Sharko on May 1, 2024 (Dkt. 32127), a deadline of July 1, 2024 was given to submit the documents required in the Amended Plaintiffs Profile Form ("PPF") Order. Diane Dotson, legal heir and next of kin of Ms. Dotson, was retained and a Suggestion of Death was filed in her individual case on May 20, 2024. Ms. Dotson's Plaintiff Profile Form was served via MDL Centrality on June 25, 2024, which was

prior to the July 1, 2024 deadline. After the Order to Show Cause was filed on April 16, 2025 (Dkt. 33664), Simmons Hanly Conroy communicated with Defense counsel via email on April 21, 2025 and counsel confirmed that Ms. Dotson's Plaintiff Profile Form had been submitted, and that Ms. Dotson's case would be removed from the list. As such, Plaintiff respectfully requests that the Court not dismiss the case with prejudice.

Dated: April 22, 2025 Respectfully submitted,

Isl John J. Foley

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed through the Court's CM/ECF system on April 22, 2025, which shall send notification of such filing to all CM/ECF participants.

Isl John J. Foley John J. Foley